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15 Maytubby, Munoz, and Pena

16 [Counsel for Plaintiff on signature page]

17 UNITED STATES DISTRICT COURT

18 EASTERN DISTRICT OF CALIFORNIA

19 FRESNO DIVISION

20 DORA SOLARES,

21 Plaintiff,

22 v.

23 RALPH DIAZ, et al.,

24 Defendants.

Case No.: 1:20-CV-00323-LHR-BAM

**STIPULATED AMENDED
SCHEDULING AND DOCKET
CONTROL ORDER; AND ORDER
THEREON**

Hon. Lee H. Rosenthal

Defendants Burnes, Gallemore, Gamboa, Garcia, Loza, Maytubby, Munoz, and Pena and Defendant Silva and Plaintiff Solares hereby stipulate and submit the following proposed amended schedule to control the above-listed matter:

1. March 31, 2025

MEDIATION

Mediation or other form of dispute resolution must be completed by this deadline.

2. April 15, 2025

COMPLETION OF NON-EXPERT DISCOVERY

Written discovery requests are not timely if they are filed so close to this deadline that under the Federal Rules of Civil Procedure the response would not be due until after the deadline.

3. April 29, 2025

EXPERTS ON MATTERS OTHER THAN ATTORNEYS' FEES

The plaintiff (or the party with the burden of proof on an issue) will designate expert witnesses in writing and provide the report required by Rule 26(a)(2) of the Federal Rules of Civil Procedure.

4. May 30, 2025

OPPOSING EXPERTS

The opposing party will designate expert witnesses in writing and provide the report required by Rule 26(a)(2) of the Federal Rules of Civil Procedure.

5. June 20, 2025

CLOSE OF EXPERT DISCOVERY

6. July 3, 2025

PRETRIAL DISPOSITIVE MOTIONS DEADLINE

No motion may be filed after this date except for good cause.

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1 7. August 22, 2025

**JOINT PRETRIAL ORDER AND
MOTION IN LIMINE DEADLINE**

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3 The Joint Pretrial Order will contain the
4 pretrial disclosures required by Rule 26(a)(3)
5 of the Federal Rules of Civil Procedure.
6 Plaintiff is responsible for timely filing the
7 complete Joint Pretrial Order. Failure to file a
8 Joint Pretrial Order timely may lead to
9 dismissal or other sanction in accordance with
10 the applicable rules.

11 8. September 5, 2025

DOCKET CALL

12 Docket Call will be held at 2:00 p.m. in a
13 location to be determined. No documents filed
14 within 7 days of the Docket Call will be
15 considered. Pending motions may be ruled on
16 at docket call, and the case will be set for trial
17 as close to the docket call as practicable¹.

18 Any party wishing to make any discovery motions should arrange for a pre-motion conference
19 with the court before the preparation and submission of any motion papers. That includes a motion to
20 compel, to quash, or for protection. Email Glenda Hassan at glenda_hassan@txs.uscourts.gov and
21 Mrs. Eddins at Lisa_Eddins@txs.uscourts.gov or fax her at 713-250-5213 to arrange for a pre-
22 motion conference. Notify your adversary of the date and time for the conference.

23 Dated: January 8, 2025

ANDRADA & ASSOCIATES

/s/ *Lynne G. Stocker*

By: Lynne G. Stocker
Attorneys for defendant SILVA

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28 ¹ The parties request that this case go to trial before the related, later-filed case of *Solares v. Burns* (1:21-cv-01349).
Plaintiff Solares and Defendant Burnes are requesting the same Docket Call date in that case but request that the second-
filed case trail this case.

1 Dated: January 8, 2025

Rob Bonta
Attorney General of California
Jon S. Allin
Supervising Deputy Attorney General

4 */s/Jeremy Duggan (as authorized 1/8/25)*

Jeremy Duggan
Deputy Attorney General
Attorneys for Defendants
*Burnes, Gallemore, Gamboa, Garcia, Loza,
Maytubby, Munoz, and Pena*

9 Dated: January 8, 2025

Law Offices of Erin Darling

11 */s/Erin Darling (as authorized 1/8/25)*

Erin Darling
Attorney for Plaintiff
Dora Solares

15 IT IS SO ORDERED.

17 Dated: ~~5~~ January 10, 2025



LEE H. ROSENTHAL
UNITED STATES DISTRICT JUDGE